

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

IN RE:) Bankruptcy Case No. 18-30504
) Chapter 7
CAROL JEAN LANE,)
)
Debtor.)
_____)

**MOTION TO APPOINT THE LAW FIRM OF JOHN W. TAYLOR, P.C.
AS GENERAL COUNSEL FOR THE TRUSTEE**

The Trustee, pursuant to Bankruptcy Code Section 11 U.S.C. Section 327 and Bankruptcy Rule 2014, respectfully moves the Court to appoint the law firm of John W. Taylor, P.C. as General Counsel to the Trustee and in support thereof states as follows:

1. The Movant is the duly appointed and acting Chapter 7 Trustee in the above captioned bankruptcy case.

2. The Movant desires to retain the services of the law firm of John W. Taylor, P.C. (“Taylor”), to perform necessary legal services for the Trustee regarding the identification and recovery of assets of the estate, including litigation, as well as other legal matters associated with the administration of the bankruptcy estate.

3. Taylor has the appropriate skills and resources needed to perform the legal services required by the bankruptcy estate. It has previously been employed as an attorney in bankruptcy cases and it has experience and expertise in performing the types of services needed herein.

4. The Movant proposes to compensate Taylor for its services at the normal hourly rates for services and the reimbursement of expenses.

5. Taylor does not have an interest adverse to the bankruptcy estate in regard to the matters for which he is to be employed, and he is a disinterested person within the meaning of 11 U.S.C. § 101(14).

6. The Movant believes that it is in the best interest of the bankruptcy estate that Taylor be appointed as general counsel for the purposes set forth above.

WHEREFORE, the Movant respectfully prays the Court that the law firm of John W. Taylor, P.C. be appointed as general counsel for the Trustee as set forth above.

DATED this 21st day of January, 2019.

/s/ John W. Taylor
John W. Taylor, Bar No. 21378
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